## FRANK & ASSOCIATES, P.C.

- ATTORNEYS AT LAW .

500 Bi-County Boulevard, Suite 112N • Farmingdale, New York 11735

Tel: (631) 756-0400 • Fax: (631) 756-05

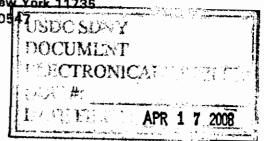
E-Mail: nfrank@laborlaws.com

Neil M. Frank

April 16, 2008

## VIA FACSIMILE (212-805-0426)

Honorable Laura Taylor Swain
United States District Court Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 755
New York, New York 10007



MEMO ENDORSED

Re: Malone et. al. v. NY Pressmen's Union Number Two, and News Corp, a/k/a NYP Holdings, d/b/a The New

York Post

Case Number: 1)7-CV-9583 (LTS) (GWG)

Your Honor:

This firm represents Plaintiffs in the above-referenced action. I write to respectfully request Plaintiffs' time to file and serve a Reply in Support of Plaintiffs' Motion for Leave to Amend the Complaint be extended from April 18, 2008 to April 25, 2003. This is Plaintiffs' second request for an extension to file and serve such a Reply as pertains to Plaintiffs' Motion for Leave to Amend. Plaintiffs' first request was granted on or about April 8, 2008.

Prior to writing this letter, I contacted counsel for Defendant Union, Carl Levine, Esq., who consents to this application.

This additional extension is necessary due to Plaintiffs' counsel being engaged in opposing a Motion for Summary Judgment in the case <u>Vivine Pinnock v. Adecco USA</u>, Inc., (Index Number: 05-23354, Supreme Court, Suffolk County). Plaintiffs' counsel is also engaged in depositions in the case <u>Williamson v. Catholic Charities of the Unocese of Rockville Centre</u>, [Case Number: 07-CV-2455 (LDW)(ETB), E.D.N.Y.] with discovery scheduled to close on April 30, 2008.

Thank you for your kind consideration of this request.

The request is granted.

Respectfully submitted,

FRANK & ASSOCIATES, P.C.

ennifer/L. DeVenuti, Esq. (JD-5778)

cc: Daniel Engelstein, Esq. (via Facsimile 212-627-8182) Michael Starr, Esq. (via Facsimile 212-918-3100) Barry Levy, Esq. (via Facsimile 516-357-3333) SO ORDERED.

LAURA TAYLOR SWAIN '
'INITED STATES DISTRICT JUDGE